Guidance Document 110-33 Use of Pharmacy Interns as Pharmacy Technicians Interpretation of § 54.1-3321 (C)

A registered pharmacy intern may perform tasks restricted to pharmacists and pharmacy technicians without being registered as a pharmacy technician. If the pharmacy intern is obtaining practical experience to meet the requirement for pharmacist licensure, the ratio of pharmacy interns to pharmacists shall be 1:1. A pharmacist supervisor may only supervise and sign affidavits for one pharmacy intern during a given time period. Pharmacy interns working as pharmacy technicians, and not using the hours worked to meet the practical experience requirement, shall be considered as part of the 1:4 pharmacist to technician ratio. For example, a pharmacist may have one pharmacy student on school curriculum rotation which would count as his or her pharmacy intern and may have as many as four pharmacy technicians, all of which may actually be pharmacy interns functioning as technicians, working at the same time.